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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAERSK, INC. and A.P. MOLLER-MAERSK A/S,

Plaintiffs,

05 CIV 4356 (RCC)

-against-

NEEWRA, INC., REDNIHOM, INC., AREF HASSAN ABUL  
INC., ARWEEN SINGH SAHNI a/k/a ARWEEN SAHNI SINGH  
a/k/a ARWEEN SAHNI a/k/a ARWEEN SINGH a/k/a ABUL  
SABAH a/k/a AREF HASSAN ABUL, MOHINDER SINGH  
SAHNI a/k/a MOHINDER SAHNI SINGH a/k/a MOHINDER  
SAHNI a/k/a MOHINDER SINGH a/k/a MOHINDER SINGH  
SAHANI a/k/a MOHINDER SAHANI a/k/a MOHINDER  
SAHANI SINGH a/k/a JOGINDER SINGH SAHNI, JOGINDER  
SINGH SAHNI a/k/a JOGINDER SINGH SAHNI a/k/a  
JOGINDER SAHNI SINGH a/k/a JOGINDER SAHNI SINGH  
a/k/a JOGINDER SINGH a/k/a JOGINDER SAHNI a/k/a  
JOGINDER SINGH a/k/a JOGINDER SAHNI, SABHARWAL  
CHANDRA KUMAR a/k/a SABHARWAL K. CHANDRA,  
MANDEEP SINGH SAHNI a/k/a MOHINDER SINGH a/k/a  
MOHINDER SAHNI a/k/a MOHINDER SINGH SAHNI a/k/a  
MOHINDER SAHANI a/k/a MOHINDER SINGH SAHANI,  
HELP LINE COLLECTION CO. W.L.L., PARKER DAWOOD  
TAJUDDIN TAJUDIS ISMAIL PARKER, SARDAR TRADERS  
EST., SARDAR INTERNATIONAL TRADING CO., AL  
TAMASOK AL ARABI EST., JOHN DOE 1-100 (fictitious) and  
JOHN DOE INC. 1-100 (fictitious),

**AFFIRMATION OF  
ERIC E. LENCK**

Defendants.  
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ERIC E. LENCK, an attorney duly admitted to this Court, hereby declares under penalty  
of perjury:

1. I am a partner in the law firm of Freehill Hogan & Mahar, LLP, attorneys for the Plaintiffs herein. I am the attorney principally responsible for this case and, as such, am fully familiar with the facts herein.

2. This affirmation is submitted in support of plaintiffs' opposition to the motion to dismiss of defendants Joginder Singh Sahni, Parkar Dawood Tajuddin (Dawood Tajuddin Parkar), Help Line Collection Co., Sardar Traders Est., Sardar International Trading Co., W.L.L., and also the separate motion to dismiss of defendant Mohinder Singh Sahani.

3. I have represented the Maersk interests for over 20 years. Based upon this representation and extensive work involving A.P. Moller-Maersk A/S and Maersk, Inc., I can state that Maersk, Inc. is the general agent in the United States for A.P. Moller-Maersk A/S.

4. Maersk, Inc. is a New York corporation, having been incorporated in the State of New York in 1943. Attached as Exhibit A is a listing from the New York Secretary of State evidencing this fact.

5. Attached as Exhibit B is a copy of the 11 June 2006 Declaration submitted by Joginder Singh Sahni in earlier proceedings relating to this action (Court Docket Item 68).

6. I inquired with moving defendants' attorney Wise whether these defendants would agree to submit to depositions prior to their motions to dismiss. I further offered to have the depositions take place at a location closer to Kuwait than New York, such as London. These proposals were declined.

7. The Declaration of Ahmed Zakaria dated 22 March 2007 is submitted herewith in support of plaintiffs' opposition to the motions to dismiss.

8. The Affidavit of Lawrence J. Kahn dated 8 June 2006 (without exhibits), submitted in earlier proceedings related to this action (Court Docket Item 66) is attached in support of plaintiffs' opposition to the motions to dismiss as Exhibit C.

9. The Declaration of Elvis Pinto dated 21 March 2007 as well as his Statement dated 18 January 2005 referenced therein is submitted herewith in support of plaintiffs' opposition to the motions to dismiss.

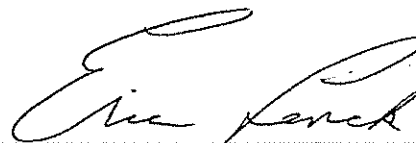
10. The Declaration of Paolo Ghirardani dated 8 June 2006 (with only some of the exhibits), submitted in earlier proceedings related to this action (Court Docket Items 72-77) is attached as Exhibit D in support of plaintiffs' opposition to the motions to dismiss.

11. Attached as Exhibit E are Exhibits 23-27 from the December 2005 deposition of Mohinder Singh Sahani and Mandeep Singh Sahni, together with transcript pages 85-89 in which these Exhibits were placed on the Record.

12. Attached as Exhibit F are pages 106-107 of the transcript of the December 2005 deposition of Mohinder Singh Sahani and Mandeep Singh Sahni.

13. References in the transcript of the December 2005 deposition of Mohinder Singh Sahani and Mandeep Singh Sahni to "Jared S. Caplan" are in error and should instead refer to Lawrence J. Kahn, who conducted the deposition. Jared S. Caplan was the U.S. Consular officer who swore in the witnesses.

~~Dated: New York, New York~~  
March 23, 2007



ERIC E. LENCK (EL 4547)